#### Case 1:16-cr-02079-SAB ECF No. 1 filed 10/12/16 PageID.1 Page 1 of 5

FILED IN THE U.S. DISTRICT COURT EASTERN DISTRICT OF WASHINGTON

Oct 12, 2016

SEAN F. McAVOY, CLERK

MICHAEL C. ORMSBY
United States Attorney
Eastern District of Washington
Thomas J. Hanlon
Assistant United States Attorney
402 E. Yakima Avenue, Suite 210
Yakima, Washington 98901
(509) 454-4425

IN THE UNITED STATES DISTRICT COURT EASTERN DISTRICT OF WASHINGTON

UNITED STATES OF AMERICA,

Plaintiff,

VS.

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DANIEL WOOLEM,

;

Defendants.

1:16-CR-2079-SAB-1 INDICTMENT

Ct. 1: 21 U.S.C. § 846 - Conspiracy to Distribute Methamphetamine

Ct. 2: 21 U.S.C. § 841(a)(1) – Distribution of Methamphetamine

Ct. 3: 21 U.S.C. § 841(a)(1) – Distribution of Methamphetamine

Ct. 4: 18 U.S.C. § 841(a)(1) – Distribution of Heroin

Ct. 5: 21 U.S.C. § 841(a)(1) – Distribution of Methamphetamine

Ct. 6: 21 U.S.C. § 841(a)(1) – Distribution of Methamphetamine

Ct. 7: 21 U.S.C. § 841(a)(1) – Distribution of Methamphetamine

Ct. 8: 21 U.S.C. § 841(a)(1) – Distribution of Methamphetamine

Notice of Criminal Forfeiture

The Grand Jury charges:

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### COUNT 1

From on or about January 27, 2016, and continuing to on or about October 6, 2016, in the Eastern District of Washington, the Defendants, DANIEL WOOLEM,

, and

others known and unknown to the Grand Jury, knowingly and intentionally combined, conspired, confederated and agreed together and with others, to commit the following offense against the United States, to wit: to knowingly and intentionally distribute 50 grams or more of a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1), (b)(1)(B)(viii), and 846.

# COUNT 2

On or about January 27, 2016, in the Eastern District of Washington, the Defendant, DANIEL WOOLEM, did knowingly and intentionally distribute 50 grams or more of a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, all in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(B)(viii).

INDICTMENT

#### COUNT 3

On or about March 23, 2016, in the Eastern District of Washington, the Defendant, did knowingly and intentionally distribute 5 grams or more of actual methamphetamine, a Schedule II controlled substance, all in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(B)(viii).

#### COUNT 4

On or about April 19, 2016, in the Eastern District of Washington, the Defendants

did knowingly and intentionally distribute a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C), and 2.

#### COUNT 5

On or about April 27, 2016, in the Eastern District of Washington, the Defendants, and DANIEL WOOLEM, did knowingly and intentionally distribute 50 grams or more of a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, all in violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(B)(viii), and 2.

# COUNT 6

On or about May 10, 2016, in the Eastern District of Washington, the

Defendants,

and DANIEL WOOLEM, did knowingly

and intentionally distribute 50 grams or more of a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, all in violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(B)(viii), and 2.

#### COUNT 7

On or about June 2, 2016, in the Eastern District of Washington, the Defendants, DANIEL WOOLEM,

did knowingly and intentionally distribute 50 grams or more of a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, all in violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(B)(viii), and 2.

#### **COUNT 8**

On or about October 6, 2016, in the Eastern District of Washington, the Defendant, DANIEL WOOLEM, did knowingly and intentionally distribute 5 grams or more of actual methamphetamine, a Schedule II controlled substance, all in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(B)(viii).

# NOTICE OF CRIMINAL FORFEITURE ALLEGATIONS

1. The allegations contained in this Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeitures pursuant to 21 U.S.C. § 853.

1	2.	Pursuant to 21 U.S.C. § 853, upon conviction of an offense in
2	violation of 2	21 U.S.C. §§ 841, 846 as set forth in this Indictment, Defendants,
3	DANIEL WO	OOLEM,
4		shall forfeit to the United States of
5	America, any	property constituting, or derived from, any proceeds obtained,
6	directly or inc	directly, as the result of such offense(s) and any property used or
7	intended to be	e used, in any manner or part, to commit or to facilitate the
8	commission of the offense(s).	
9	3.	If any of the property described above, as a result of any act or
10	omission of the Defendant(s):	
11	a. o	cannot be located upon the exercise of due diligence;
12	b. 1	has been transferred or sold to, or deposited with, a third party;
13	c. 1	has been placed beyond the jurisdiction of the court;
14	d. 1	has been substantially diminished in value; or
15 16	e. has been commingled with other property which cannot be divide without difficulty, the United States of America shall be entitled to forfeiture of substitute property pursuant to 21 U.S.C. § 853(p), and 28 U.S.C. § 2461(c).	
17	DATE	D: October 12, 2016.
18		A TRUE BILL
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21		Presiding Juror
22	MICHAEL C. ORMSBY United States Attorney	
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25	Thomas J. Hanlon Assistant United States Attorney	
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